IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH
OF A GREEN APPLE IPHONE
WITH A CLEAR CASE IN THE
POSSESSION OF THE FEDERAL
BUREAU OF INVESTIGATION

Case No. 1:22MJ466

MOTION TO REDACT THE SEARCH WARRANT AFFIDAVIT

NOW COMES the United States of America, by Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, through her assistant, Craig M. Principe, and respectfully moves this Honorable Court to redact portions of the search warrant affidavit (as identified in the attachment to the sealed supplement to this motion) and completely seal the supplement to this motion in this matter. Such redaction and sealing are within the inherent power of the court to control papers filed with it. *See, e.g., Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989). In support whereof, the government shows unto the court the following:

(1) The search warrant affidavit describes an investigation involving threats by the defendant to murder and injure FBI agents and a threat towards a private media organization, including identifying details of witnesses related thereto.
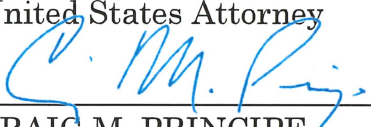
1

(2) Therefore, disclosure of certain details of the search warrant affidavit, specifically the initials of a Washington Field Office Special Agent, and the initials of a witness at the media organization, and the supplement to this motion may have a significant negative impact on the safety of potential witnesses or subject them to retaliation or intimidation.

WHEREFORE, the government respectfully moves that this Honorable Court redact portions of the search warrant affidavit and entirely seal the supplement to this motion until further order of the Court.

This the 15th day of December, 2022.

Respectfully submitted,

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2